

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

Anthony L. Mann,

Plaintiff,

vs.

Lt. C Failey, Maj. Sheronda Sutton,  
Warden Robert Stevenson, III; Ass  
Warden Larry Cartledge; Ass. Warden  
John Barkley; Inv David Hurt, Valerie  
Whitaker, Classification Mngr Macon,  
Donald Sampson, M.D.; Robyn Elergy;  
E. Keitt, James Harris, III; Capt Percy  
Jones, Capt. Wilson, Lt Willie  
Simmons, Lt. T. Johnson; Sgt. Belue;  
Sgt. Young, Sgt. Herman Wright; Sgt.  
Keith Moore; Cpl. Otis Daniels, Cpl.  
Vincent Manley; Cpl. Smalls, Cpl. Ray,  
Ofc Murray; Ofc. McNeal; Ofc. Cox,  
Christian Manganelli, C. Cook,

Defendants.

C/A No. 0:11-cv-2232-RMG

**DEFENDANTS' REPLY TO  
PLAINTIFF'S RESPONSE TO MOTION  
IN LIMINE TO EXCLUDE EVIDENCE  
OF INTERACTIONS BETWEEN  
DEFENDANTS AND OTHER INMATES**

**TO: XAVIER STARKES, ESQUIRE; STANLEY MYERS, ESQUIRE; ATTORNEYS  
FOR PLAINTIFF:**

Plaintiff filed his Response (ECF No. 266) to Defendants' Motion in *Limine* to Exclude Evidence of Interactions Between Defendants and Other Inmates. (ECF No. 250). Pursuant to Local Rule 7.07, DSC, Defendants, by and through the undersigned attorneys, hereby submit this Reply to address issues raised in Plaintiff's Response and also to further support their Motion in *Limine* to Exclude Evidence of Interactions Between Defendants and Other Inmates (hereinafter "Motion").

While Plaintiff argues that interactions between the Defendants and inmates other than Plaintiff can be brought out through personal testimony, those interactions that do not involve

Plaintiff are inadmissible. Defendant seeks to exclude interactions such as prior disciplinaries, corrective actions, and other interactions or encounters between Defendants' and other SCDC employees and other inmates or alleged witnesses to this lawsuit. This information and/or documentation is wholly irrelevant to the allegations contained within the Complaint, and consequently, are highly prejudicial and are not admissible.

Respectfully submitted,

*s/Richard E. Marsh, III*

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